

TEXAS ANIMAL HEALTH COMMISSION

"SERVING TEXAS SINCE 1893"

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July 6, 2005

Mr. Neil Hammerschmidt
Animal Identification Officer
Eradication and Surveillance Team
National Center for Animal Health Programs
VS, APHIS
4700 River Road Unit 43
Riverdale, Maryland 20737-1231

RE: DOCKET NO. 05-015-1 National Animal Identification System Notice of Availability of a Draft Strategic Plan and Program Standards

Dear Mr. Hammerschmidt:

We appreciate the opportunity to submit comments regarding the National Animal Identification System (NAIS) Draft Strategic Plan and Program Standards – Docket No: 05-015-1.

We support the overall objectives of the NAIS and the Program Standards to:

- ☐ Establish a uniform national standard for uniquely identifying locations that produce, manage, and hold livestock.
- ☐ Establish a uniform national standard for uniquely identifying individual animals and a group or lot of animals as they move through the marketing chain.
- ☐ Establish a uniform national standard data management system for recording the movements of individual and lots of animals at change of ownership, interstate movement, and commingling with other owners livestock.
- ☐ Establish the ability to trace a diseased animal of concern from point of diagnosis through the marketing chain to herd of origin within 48 hours.

We support the five guiding principles of the Draft Strategic Plan and the Program standards establishing:

- ☐ Uniform data standards throughout the U.S. supporting premises registration, animal identification, and animal tracking.
- ☐ Coordination of NAIS with production management systems and marketing incentives.
- ☐ Mandated implementation for all livestock species.
- ☐ Cooperative efforts by industry and government to achieve 48 traceback.
- ☐ Secured, reliable and confidential information.

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TOPICS OF SPECIAL INTEREST:

Curtailments Associated With Technology Neutral:

We strongly support the NAIS Cattle Industry Working Group calling for the individual identification of all cattle, utilizing ISO-compliant Radio Frequency Identification Device (RFID) ear tags as the standard for implementing the NAIS in the U.S. cattle industry. While technology neutral may be a favored politically correct position, it provides no leadership, guidance or incentive in the market place for infrastructure development. Technology neutral dictates that producers, marketing agents and packing plant managers must have all forms of ID equipment available just in case an animal shows up with a varying type of ID device. Technology neutral only adds expense not effectiveness to the program.

To maintain continuity of animal disease programs and reporting animal tracking data to the NAIS, we support the use of RFID technology in all livestock species as deemed effective and appropriate by the NAIS Specie Working Groups.

Confidentiality of data:

All information contained in the NAIS should be protected from disclosure. The sole purpose of the NAIS is to enhance the U.S. disease surveillance and monitoring system. The animal tracking component promises to provide animal health authorities the opportunity to significantly improve plans to prevent and control disease outbreaks. The same data set given access to the public could be used to significantly improve plans to start a disease outbreak. This is a major issue with the livestock industries of our country and must be addressed if we hope to have support from the industries for full implementation of NAIS.

Data management systems:

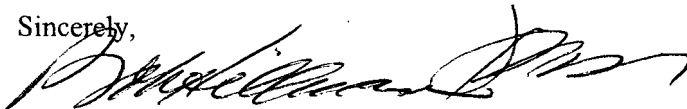
Another major item of discussion in the majority of livestock producer meetings is management of animal identification and animal movement data. We encourage USDA to carefully explore all reasonable options for management of NAIS related data in order to assure that the best possible system is implemented in our country.

Implementation across species:

Ideally, implementation should occur across all livestock species concurrently. However, we recognize that some species working groups are farther along with their recommendations than others. In this light we believe that cattle, swine and sheep and goats logically should be the first to implement NAIS. Having said that, we also recognize that sheep and goats are not small cattle and that additional work may be necessary before we can fully implement RFID technology for identification of sheep and goats. In the meantime, sheep and goats should continue to be identified with the scrapie tags.

Thank you for the opportunity to submit these comments and participate in the process.

Sincerely,



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